

Before the
Federal Communications Commission
Washington, DC 20554

RECEIVED

MAR 5 1996

FCC MAIL ROOM

In the matter of

Notice of Inquiry)
IMPROVING COMMISSION PROCESSES)

PP Docket 96-17

To: The Commission

DOCKET FILE COPY ORIGINAL

COMMENTS OF: THE W5YI GROUP, INC.

INTRODUCTION

The W5YI Group, Inc., files these comments in support of the Commission's efforts to improve quality of service, and its productivity. The Commission is to be applauded for seeking out constructive recommendations from the public - since private entities can indeed assist. Increased efficiency is absolutely essential since FCC resources are less but its responsibilities are being significantly increased by the Telecommunications Act of 1996 (Public Law 104-104).

Through its two divisions (the W5YI-VEC and National Radio Examiners) the W5YI Group currently provides both amateur and commercial radio operator examination and application handling services to the public. In 1984, the W5YI-VEC was the first private organization to enter into a Memorandum of Agreement with the FCC to provide amateur radio operator license testing on a national basis. Due to the success of this program, the Commission expanded

privatized license examinations to include Commercial Radio Operator licenses. In 1993, we formed a separate division, National Radio Examiners (NRE) to handle this function for the Commission.

NRE is now the largest Commercial Operator License Examination Manager (COLEM) and the second largest Volunteer-Examiner Coordinator (VEC) in the Amateur Service. The COLEM and VEC act as the link between the examiners in the field who administer the license examinations and the FCC who issues the license. Our organization has nearly 1,000 license examination locations located throughout the world and approximately 20,000 accredited examiners.

All applications for amateur and commercial radio operator licenses are filed electronically with the FCC "computer-to-computer" which greatly saves FCC paperwork processing while improving speed-of service to the public - a "win-win" situation.

Our organization receives license examination fees from the applicant and supplements our income through the distribution of license preparation materials. We have several full time employees and our corporation pays considerable local, state and federal taxes. Instead depleting precious FCC resources and being a drain on the

taxpayer, the privatization of Amateur and Commercial Radio Operator testing now contributes to the U.S. economy.

The end result is the best of all worlds: the quality of service is better, the Commission 's paperwork burden is greatly reduced and the FCC is better able to allocate dwindling budgetary and personnel resources.

SUGGESTION FOR FURTHER PRIVATIZATION - At present, the Commission's privatized radio operator license program only extends to amateur and commercial examinations. There are, however, several other functions that the COLEMs and VECs could handle if they were permitted to charge a fee - even if the fee was assessed only on a voluntary payment basis.

These functions include the administrative handling of amateur and commercial radio operator license modifications, renewals, the issuance of Amateur station call signs and/or Commercial operator license numbers and the mailing of licenses, permits, certificates and endorsements.

Due to fewer bureaucratic layers and other economies, we believe private entities can complete these functions at less expense than it would cost the government to handle them. Perhaps the FCC's entire license issuance function could be privatized to user groups, examination providers

and/or private contractors. A block of license call signs/numbers could be allocated to each entity.

If the Commission felt it necessary to retain the actual station call sign and license number issuance function, then perhaps private contractors could obtain this information from the Internet and mail the new/modified/renewed license to the applicant for a fee which would be voluntarily paid by the recipient.

AMATEUR VANITY CALL SIGN SYSTEM - The "Vanity" station call sign program in the Amateur Service is in the process of being implemented. We believe that private contractors (or groups such as our VEC organization) can complete the necessary data input which is significant. The information could then easily be transmitted to the Commission in much the same manner that we electronically file Amateur and Commercial Radio Operator license application information.

We further believe that Amateur Operators - who wish fast handling to insure receipt of their selected call sign - will be willing to pay an additional fee for same day handling of their Vanity call sign. Instead of the Mellon Bank (the Commission's fee collection contractor) sending the FCC Form 610-V Vanity Call Sign applications to Gettysburg for handling in order, a VEC could provide the

Mellon Bank with Federal Express return envelopes and the applications could be routed to them for data entry.

The VEC would (for an additional fee from the applicant) immediately input the Vanity Call Sign data of an applicant. In short, we believe private groups could handle the input of Vanity Call Sign data far quicker than the FCC could in Gettysburg. An applicant is certain to be willing to pay for this preferential priority (fast) handling directly input into the FCC's computer by a VEC.

AMATEUR/COMMERCIAL RADIO LICENSING IS A DRAIN ON RESOURCES -

It has long been our opinion that the cost to handle all licensing should be borne by the applicant who receives the benefit of the license. At present, however, the FCC realizes no fees whatsoever when an applicant is issued a new Amateur or Commercial Radio Operator license, permit, certificate or endorsement. Although there are significant Commission services rendered, there are no [Sec. 9, 47 U.S.C. 159] "regulatory" fees imposed whatsoever upon either Amateur or Commercial Radio Operators. Commercial Radio Operators only pay an Application Fee [Sec. 8, 47 U.S.C.] upon license renewal, replacement, duplication or modification.

Amateur Radio Operators never pay a fee for any

Commission administrative or regulatory service. Volunteer-examiner Coordinators (VECs) are permitted only to recoup out-of-pocket expenses [Sec. 4(f)(4)(J), 47 U.S.C. 154] up to a specified amount adjusted annually for inflation.

LICENSE RENEWAL PRIVATIZATION - On the other hand, it has been our experience that Amateur operators are indeed willing to voluntarily pay for provided administrative services. During 1994-1995, our Group provided a renewal service for Amateur Radio Operators/Station licensees whose ten year license term had expired.

The expiration date of Amateur Radio Operator licenses is public information which is contained in the FCC's Amateur Service data base. We captured this information and mailed a notification and renewal form (FCC Form 610) to every Amateur whose license was expiring. We asked for a \$5.00 "donation" and a great many operators took advantage of our service.

We discontinued this service, however, when the Commission began mailing out its own Amateur renewal notices. (The FCC does not notify Commercial Radio Operator licensees of license expiration.) The Commission may want to permit private groups to again handle the renewal service - a fee for which would be voluntarily paid by the

Radioamateur community.

There are approximately 5,000 Amateur Service licensees and an unknown quantity of Commercial Radio licensees whose license expires monthly. We estimate that the cost to mail renewal reminders (including salaries, printing and postage) to amateurs alone costs the Commission thousands of dollars annually. This expense could all be eliminated.

The advantage of allowing VECs and/or COLEMs to handle renewals is that they can electronically transmit the license renewal directly into the Commission's computer just as they do for new licenses thereby saving the FCC Gettysburg, PA licensing facility the expense of data entry.

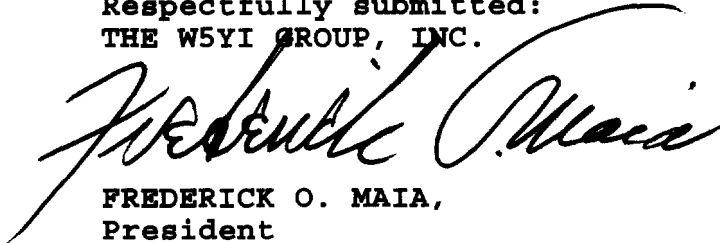
PRIVATE ISSUANCE OF ALL RADIO OPERATOR LICENSES - If the Commission is not willing to allow private contractors to issue Amateur station call signs and Commercial Radio Operator license numbers, then perhaps the FCC could post all license grant information to the Internet. Licensees who wished to have a hard copy of their license could obtain this document from a VEC or COLEM upon payment of a competitive fee.

CONCLUSION - We believe that the further privatization of Commission Amateur and Commercial Radio Operator licensing

will:

- (1.) conserve FCC resources,
- (2.) provide better service to the applicant (since an improved document "product" could be delivered quicker) and;
- (3.) would provide jobs at VEC/COLEM facilities.

Respectfully submitted:
THE W5YI GROUP, INC.



FREDERICK O. MAIA,
President

The W5YI Group, Inc.
2000 E. Randol Mill Road, Suite 608-A
Arlington, Texas 76012

c.c: Wireless Telecommunications Bureau
Robert H. McNamara

FCC Licensing Division
Walter Boswell

Date: March 4, 1996